

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

United States District Court
Southern District of Texas
FILED

JAN 30 2019

David J. Bradley, Clerk

UNITED STATES OF AMERICA

v.

**JONATHAN MUNOZ
MATTHEW MUNOZ
JUAN ANGEL VASQUEZ, JR.**

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Criminal No.

M-19-161

SEALED INDICTMENT

THE GRAND JURY CHARGES:

Count One

On or about September 15, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JONATHAN MUNOZ
and
MATTHEW MUNOZ**

knowingly made, and aided and abetted the making of, a false statement and representation with respect to information required to be kept in the records of Academy Sports & Outdoors, in Pharr, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Glock, Model G42, .380 auto pistol in that the defendant JONATHAN MUNOZ aided and abetted MATTHEW MUNOZ who, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that MATTHEW MUNOZ was the actual buyer of the firearm described above, which statement was intended and likely to deceive the federally licensed firearms dealer as to a fact material to the lawfulness of the sale of the firearm, when in truth and fact the defendants knew that those statements and representations were false and that MATTHEW MUNOZ was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

Count Two

On or about September 15, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

JONATHAN MUNOZ

knowingly made a false statement and representation with respect to information required to be kept in the records of Academy Sports & Outdoors, in Pharr, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Glock, Model G42, .380 auto pistol in that the defendant falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473 that he was the actual buyer of the firearm described above, which statement was intended and likely to deceive the federally licensed firearms dealer as to a fact material to the lawfulness of the sale of the firearm, when in truth and fact the defendant knew that those statements and representations were false and that he was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

Count Three

On or about October 24, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

JUAN ANGEL VASQUEZ, JR.

knowingly made a false statement and representation with respect to information required to be kept in the records of Academy Sports & Outdoors, in McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of three Glock, Model 42, .380 auto pistols in that the defendant falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473 that he was the actual buyer of the firearms described above, which statement was intended and

likely to deceive the federally licensed firearms dealer as to a fact material to the lawfulness of the sale of the firearms, when in truth and fact the defendant knew that those statements and representations were false and that he was not the actual buyer of the firearms.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

A TRUE BILL

FOREPERSON

RYAN K. PATRICK
UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY